

## REMARKS

Claims 1-20 were previously presented in the above-identified application. Upon entry of this response, which amends claims 1, 10, and 14 and adds claim 21 and 22, claims 1-22 remain pending. The Applicants respectfully request reconsideration of the rejections in view of the following remarks. No new matter has been added with this response.

### Section 102(b): Furegati.

Originally filed claims 1, 10, and 14 and respective dependent claims 2-9, 11-13, and 15-20 were again rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,966,704 ("Furegati"). Applicants respectfully traverse this rejection for reasons that follow.

### Claims 1, 10 and 14.

Applicants respectfully submit that Furegati fails to disclose each of the elements set forth in amended claim 1. For example, amended claim 1 now recites: "forming a parametric index . . . using categorical attributes to reference a subset of elements where said categorical attributes are qualitative parameters." As explained in the description of a specific embodiment of the claimed invention, "[t]he parametric index is an arrangement of data from the inverted index that is organized according to qualitative parameters (i.e., categorical attributes)," see Specification, p. 4, lines 4-5.

By contrast, Furegati at most teaches a parametric index that references its parametric index elements using a numeric reference pointer. As indicated in FIG. 4B and at col. 8, lines 6-14, Furegati uses numeric reference pointers, such as reference pointer 471 for table 47 and reference pointer 481 for table 48, to reference the particular index elements. In particular, these reference pointers are numeric, such as the numbers from 000001, 000002, . . . to 999999 (as shown in FIG. 4B), and thus quantitative rather than qualitative. As Furegati teaches only of quantitative references to parametric index elements, Furegati cannot be said to teach or even

suggest “forming a parametric index . . . using categorical attributes . . . [that] are qualitative parameters,” as recited in claim 1.” Therefore, amended claim 1 is distinguishable from the teachings of Furegati.

So, for at least the foregoing reasons, Applicants respectfully submit that claim 1 is now in condition for allowance. Claims 2-9 depend from allowable independent claim 1 and thus are patentable for at least the same reasons. Therefore, withdrawal of the §102(b) rejection in connection with these claims is respectfully requested.

For at least similar reasons, Applicants also submit that Furegati fails to disclose each of the elements set forth in claims 10 and 14. As only one example, Furegati neither teaches nor suggests forming a parametric index using categorical attributes to reference a subset of elements where the categorical attributes are qualitative parameters. Consequently, Furegati cannot be said to disclose “mapping said text search results into a parametric index . . . using categorical attributes to reference a subset of elements where said categorical attributes are qualitative parameters,” and “a first set of instructions to specify a first parametric group and a second parametric group corresponding to elements in a parametric index, said parametric index using categorical attributes to reference at least one of said elements where said categorical attributes are qualitative parameters,” as set forth in claims 10 and 14, respectively, of the subject application.

Accordingly, Applicants respectfully submit that claims 10 and 14 are now in condition for allowance. Claims 11-13 and 15-17, 19-20 depend from allowable independent claims 10 and 14, respectively, and thus are patentable for at least the same reasons. Therefore, withdrawal of the §102(b) rejection in connection with these claims is respectfully requested.

#### **Claims 14, 21 and 22.**

Amended independent claim 14 and new dependent claims 21 and 22 recite additional novel and non-obvious features that further distinguish the claimed invention over Furegati. In particular, amended claim 14 now also recites: “a second set of instructions . . . independent of a query language.” Similarly, new claims 21 and 22 both recite “merging further comprises performing a logical operation that is independent of a query language.” According to the claimed invention, a query language statement, such as a statement in structure query language

("SQL"), need not be used to perform a logical operation. In particular, the Specification, at p. 5, lines 13-20, indicates that "the present invention is relatively fast since SQL statement do not have to be formed and the parametric index is relatively small, so it can be stored in primary memory, allowing for rapid processing." (emphasis added).

By contrast, Furegati appears to require some kind of query language (generally synonymous with data manipulation language) to access storage. As an example, Furegati mandates at col. 4, lines 24-31: "[r]equired is a software layer between the application and the particular storage subsystem or subsystems where application data requests are dynamically translated into the appropriate Data Manipulation Language (DML) statements for the particular storage subsystem or subsystems such as, for example, Structured Query Language (SQL)." See also col. 10, lines 7-11 ("[After a user request is split into subqueries, t]he appropriate data manipulation statements are now created depending on data bases or files actually used and the subqueries are then submitted for execution. An example of a Data Manipulation Language (DML) is known as Structured Query Language (SQL)."). Therefore, Furegati seems to require using a query language when a query (or subquery) involves accessing any of Furegati's index elements (i.e., parametric, contextual, or signal) of a storage segment. Consequently, Furegati cannot be said to teach or even suggest either "a second set of instructions . . . independent of a query language," or "performing a logical operation . . . independent of a query language." Therefore, amended claim 14 as well as claims 21 and 22 are further distinguishable from Furegati.

Accordingly, Applicants respectfully submit that claims 14, 21 and 22 are now in condition for allowance. Claims 18-20 depend from allowable independent claim 14, respectively, and thus are patentable for at least the same reasons. Therefore, withdrawal of the §102(b) rejection in connection with these claims is respectfully requested.

Applicants strenuously maintain that the originally-filed claims are patentable, but now amend the subject application for purposes of expediting prosecution toward an early allowance. Therefore, Applicants reserve the right to reintroduce claims as originally filed. Should the Applicants choose not to reintroduce those claims, Applicants do not imply (and it should not be inferred) that the presently amended claim scope is the broadest to which they are entitled.

### CONCLUSION

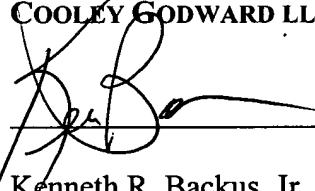
In sum, all of the independent claims and their associated dependent claims should now be in a condition for allowance, which is respectfully solicited. If the Examiner believes that any of the claims are not in a condition for allowance, the Examiner is encouraged to contact the undersigned to resolve any outstanding issues.

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Respectfully submitted,  
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